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October 8, 2019

VIA ECF

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States  
Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

We write to ask the Court to extend the time by which counsel for the *Ashton, Burnett, O'Neill* and *Federal Insurance* plaintiffs have to file written objections to the Report and Recommendation of Magistrate Judge Sarah Netburn issued on September 30, 2019 and / or to move to reconsider that decision. ECF 5180. In her decision, Magistrate Netburn directs the parties to meet and confer on three topics. ECF 5180 at 12 – 13. Given scheduling issues among various counsel, it appears that such a meet-and-confer cannot be scheduled before the week of October 14, 2019. Because that is the date that objections and / or a motion to reconsider would be due and because the meet-and-confer may narrow the issues to be raised in any such objections or motion, we respectfully ask that this Court extend the time by which written objections to the Report and Recommendation be filed pursuant to 29 U.S.C. § 636(b)(1) and Fed.R.Civ.P. 72(b), or by which a Motion for Reconsideration must be filed, by an additional four weeks, until November 12, 2019.

This is the first request for an extension and the *Havlish* parties consent to the request for an extension.

Respectfully,

KREINDLER & KREINDLER LLP

/s/ James P. Kreindler

cc: All counsel of record via ECF